

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shawn Patterson,)	
)	
Plaintiff,)	07 C 6696
)	
vs.)	Honorable Judge
)	James Zagel
Dr. K Sims)	
Captain Cozalino,)	
Officer Wagner)	
)	
Defendants.)	

**MOTION TO ENLARGE THE TIME PERIOD IN WHICH
TO MOVE, ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendants', Dr. K Sims, Captain Cozalino, and Officer Wagner through their attorney, RICHARD A. DEVINE, State's Attorney of Cook County, by his Assistant State's Attorney, Michael A. Kuczwara Jr., pursuant to Federal Rule of Civil Procedure 6(b) (1), moves this Honorable Court to enlarge the time period in which to answer or otherwise plead until March 21, 2008, and to vacate any and all defaults that may have been entered. In support, defendant states:

1. Defendants' were served with summons on January 28, 2008.
2. Defendants' subsequently requested representation from the Cook County State's Attorney's Office, and the undersigned attorney was assigned to represent the defendants' on February 8, 2008.
3. The undersigned immediately ordered all CCDOC records and Cermak records for The Plaintiff that may be germane to Plaintiffs' claims. These are expected to be voluminous, and will take a great deal of time to assemble due to the wide range of allegations involved in the Complaint.

4. That once the undersigned attorney is in receipt of all relevant jail and medical records regarding the incident(s) alleged in the complaint, he will have to determine whether an answer or dispositive motion should be filed on behalf of the defendants', and subsequently served defendants. If an answer is to be filed, the undersigned must meet with all served defendants to prepare their answers and determine whether any conflict in representation exists.

5. The undersigned is also defending over twenty other civil rights cases pending in this District which require litigation responsibilities too numerous to list here.

6. The undersigned attorney is not being dilatory in bringing this motion, and apologizes to this Honorable Court for any inconvenience that this extension may cause.

WHEREFORE, the defendant respectfully requests that this Honorable Court vacate any defaults, technical or otherwise that may have been entered, and grant an enlargement of time until March 21, 2008, to move, answer or otherwise plead in this matter.

Respectfully submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

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